

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**FILED**  
4/29/2021 <sup>JMK</sup>  
THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA )  
)  
v. )  
)  
BARRY SHI, )  
ANDREW DARIEN MCLEOD, )  
JAMEL T. WILLIAMS, )  
SAAQUAN RAM, )  
JAMES B. GIBBS, )  
YI LIU, )  
CHRISTOPHER JOHNSON, )  
DAJUAN GEE, )  
YANG SONG, )  
a/k/a "Nicole Song," )  
JAYVON A. PUGH, )  
KADEEM DEAN, )  
ENPING QU, )  
CAN JIANG, )  
ESRON A. MURRELL, )  
ZANPENG CHEN, )  
JEFF MURAT, )  
CHRISTOPHER T. THOMPSON, )  
JOHN LIU )  
a/k/a "Xiqiang Liu," )  
SADIKIFU NAWAB SHABAZZ, )  
BYRON HICKMAN, )  
CLIVE BAKER, and )  
DAVIN SMART )

**1:21-CR-277**

Violations: Title 18, United States  
Code, Sections 1028A and 1343

**JUDGE KNESS  
MAGISTRATE JUDGE FUENTES**

**UNDER SEAL**

**COUNTS ONE THROUGH TWENTY-TWO**

The SPECIAL MAY 2019 GRAND JURY charges:

1. At times material to this indictment:

a. Company A was headquartered in the Northern District of Illinois

and operated retail stores throughout the United States and the Northern District

of Illinois, which stores sold, among other things, clothing, electronics, toys, furniture, and home décor.

b. Company A allowed its customers to purchase goods from its retail stores in a variety of ways, including through the use of payment cards.

c. Payment cards, which included credit cards, debit cards, and gift cards, are encoded with data unique to each cardholder. Payment card data was used to obtain money, or to initiate a transfer of funds, at the direction of the authorized cardholder.

d. When customers used payment cards to purchase goods at Company A stores, Company A used computers at the point of sale ("Payment Processor Computers") to capture the payment card data and thereby obtain the funds needed to complete each sale. Company A maintained the Payment Processor Computers at the retail stores where its goods were sold, including at stores located in the Northern District of Illinois.

e. Victims 1 through 80 were residents of the Northern District of Illinois and Company A customers who used payment cards to purchase goods at Company A stores.

f. Company A maintained a computer network, through which authorized Company A employees could access and communicate with various Company A computers, including the Payment Processor Computers maintained at each Company A retail store.

g. Bitcoin was a virtual currency that was circulated over the Internet, but not backed by a government. Bitcoin was transacted using a virtual currency exchange, which allowed trading between Bitcoin, the U.S. dollar, other fiat currencies, and other virtual currencies.

2. Between no later than August 2016, and continuing until at least July 29, 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

BARRY SHI,  
ANDREW DARIEN MCLEOD,  
JAMEL T. WILLIAMS,  
SAAQUAN RAM,  
JAMES B. GIBBS,  
YI LIU,  
CHRISTOPHER JOHNSON,  
DAJUAN GEE,  
YANG SONG, a/k/a "Nicole Song,"  
JAYVON A. PUGH,  
KADEEM DEAN,  
ENPING QU,  
CAN JIANG,  
ESRON A. MURRELL,  
ZANPENG CHEN,  
JEFF MURAT,  
CHRISTOPHER T. THOMPSON,  
JOHN LIU, a/k/a "Xiqiang Liu,"  
SADIKIFU NAWAB SHABAZZ,  
BYRON HICKMAN,  
CLIVE BAKER, and  
DAVIN SMART,

defendants herein, together with Co-Schemer A, Co-Schemer B, and others known and unknown, knowingly devised, intended to devise, and participated in a scheme to defraud Company A's customers and other payment cardholders, and to obtain money and property by means of materially false and fraudulent pretenses,

representations, promises, and the concealment of material facts, as more fully described below.

3. It was part of the scheme that defendants BARRY SHI, ANDREW DARIEN MCLEOD, JAMEL T. WILLIAMS, SAAQUAN RAM, JAMES B. GIBBS, YI LIU, CHRISTOPHER JOHNSON, DAJUAN GEE, YANG SONG (a/k/a “Nicole Song”), JAYVON A. PUGH, KADEEM DEAN, ENPING QU, CAN JIANG, ESRON A. MURRELL, ZANPENG CHEN, JEFF MURAT, CHRISTOPHER T. THOMPSON, JOHN LIU (a/k/a “Xiqiang Liu”), SADIKIFU NAWAB SHABAZZ, BYRON HICKMAN, CLIVE BAKER, DAVIN SMART, and others, including Co-Schemer A, Co-Schemer B, and Co-Schemer C, fraudulently obtained and caused to be obtained money from Company A’s customers, including customers residing in the Northern District of Illinois, by obtaining without authorization the payment card data of millions of Company A customers and by using and attempting to use that data to purchase goods and services without the customers’ authorization.

4. It was further part of the scheme that, between in or about August 2016 and April 20, 2017, Co-Schemer A accessed without authority the Company A computer network and installed a malicious software program (“malware”) on multiple Company A computers, allowing Co-Schemer A to capture payment card data from Payment Processor Computers at over 400 different Company A retail stores and to extract that data from the Company A computer network without Company A’s authorization.

5. It was further part of the scheme that, between on or about September 4, 2016 and April 29, 2017, Co-Schemer A used the point-of-sale malware to extract the data of over three million payment cards that had been used at Company A stores, including the payment card data of Victims 1 through 80, from the Company A computer network without the authorization of Company A or the victims.

6. It was further part of the scheme that, by no later than January 25, 2017, Co-Schemer A began transferring the payment card data that Co-Schemer A had stolen from Company A to Co-Schemer B. Between on or about March 26, 2017, and on or about August 1, 2017, Co-Schemer B paid Co-Schemer A approximately \$4 million worth of Bitcoin over the course of approximately 66 transactions, in exchange for that stolen payment card data.

7. It was further part of the scheme that, between no later than January 25, 2017, and continuing until at least July 29, 2020, Co-Schemer B sold, and offered for sale, the payment card data of over six million payment cards, including over three million cards used at Company A stores and stolen by Co-Schemer A, on two different websites (together, the "Co-Schemer B Websites"), to over 3,000 different website users.

8. It was further part of the scheme that, between no later than January 25, 2017, and continuing until at least January 27, 2020, BARRY SHI, ANDREW DARIEN MCLEOD, JAMEL T. WILLIAMS, SAAQUAN RAM, JAMES B. GIBBS, YI LIU, CHRISTOPHER JOHNSON, DAJUAN GEE, YANG SONG (a/k/a "Nicole Song"), JAYVON A. PUGH, KADEEM DEAN, ENPING QU, CAN JIANG, ESRON

A. MURRELL, ZANPENG CHEN, JEFF MURAT, CHRISTOPHER T. THOMPSON, JOHN LIU (a/k/a "Xiqiang Liu"), SADIKIFU NAWAB SHABAZZ, BYRON HICKMAN, CLIVE BAKER, and DAVIN SMART purchased payment card data of thousands of payment cards, including thousands of payment cards used at Company A stores and stolen by Co-Schemer A, from the Co-Schemer B Websites. Specifically:

a. Between January 25, 2017 and January 27, 2020, BARRY SHI purchased the payment card data of at least 18,742 payment cards from the Co-Schemer B Websites, including at least 13,429 cards used at Company A stores and stolen by Co-Schemer A, in exchange for at least approximately \$507,273 worth of Bitcoin.

b. Between February 25, 2017 and November 11, 2019, ANDREW DARIEN MCLEOD purchased the payment card data of at least 9,343 payment cards from the Co-Schemer B Websites, including at least 6,006 cards used at Company A stores and stolen by Co-Schemer A, in exchange for at least approximately \$226,545 worth of Bitcoin.

c. Between July 12, 2017 and October 22, 2019, JAMEL T. WILLIAMS purchased the payment card data of at least 5,029 payment cards from the Co-Schemer B Websites, including at least 3,564 cards used at Company A stores and stolen by Co-Schemer A, in exchange for at least approximately \$37,286 worth of Bitcoin.

d. Between April 10, 2017 and November 18, 2019, SAAQUAN RAM purchased the payment card data of at least 4,880 payment cards from the Co-

Schemer B Websites, including at least 3,241 cards used at Company A stores and stolen by Co-Schemer A, in exchange for at least approximately \$76,524 worth of Bitcoin.

e. Between April 16, 2017 and September 12, 2019, JAMES B. GIBBS purchased the payment card data of at least 4,535 payment cards from the Co-Schemer B Websites, including at least 3,936 cards used at Company A stores and stolen by Co-Schemer A, in exchange for at least approximately \$44,762 worth of Bitcoin.

f. Between February 4, 2017 and January 27, 2020, YI LIU purchased the payment card data of at least 4,426 payment cards from the Co-Schemer B Websites, including at least 3,248 cards used at Company A stores and stolen by Co-Schemer A, in exchange for at least approximately \$284,564 worth of Bitcoin.

g. Between April 24, 2017 and November 20, 2019, CHRISTOPHER JOHNSON purchased the payment card data of at least 4,265 payment cards from the Co-Schemer B Websites, including at least 2,691 cards used at Company A stores and stolen by Co-Schemer A, in exchange for at least approximately \$55,290 worth of Bitcoin.

h. Between February 21, 2017 and November 17, 2019, DAJUAN GEE purchased the payment card data of at least 4,256 payment cards from the Co-Schemer B Websites, including at least 2,997 cards used at Company A stores and

stolen by Co-Schemer A, in exchange for at least approximately \$48,173 worth of Bitcoin.

i. Between January 28, 2017 and May 5, 2018, YANG SONG, a/k/a “Nicole Song,” purchased the payment card data of at least 3,604 payment cards from the Co-Schemer B Websites, including at least 2,825 cards used at Company A stores and stolen by Co-Schemer A, in exchange for at least approximately \$81,181 worth of Bitcoin.

j. Between March 18, 2017 and October 25, 2019, JAYVON A. PUGH purchased the payment card data of at least 3,271 payment cards from the Co-Schemer B Websites, including at least 2,086 cards used at Company A stores and stolen by Co-Schemer A, in exchange for at least approximately \$55,039 worth of Bitcoin.

k. Between January 26, 2017 and November 5, 2019, KADEEM DEAN purchased the payment card data of at least 2,806 payment cards from the Co-Schemer B Websites, including at least 1,854 cards used at Company A stores and stolen by Co-Schemer A, in exchange for at least approximately \$149,205 worth of Bitcoin.

l. Between July 16, 2017 and March 28, 2018, ENPING QU purchased the payment card data of at least 2,637 payment cards from the Co-Schemer B Websites, including at least 864 cards used at Company A stores and stolen by Co-Schemer A, in exchange for at least approximately \$39,175 worth of Bitcoin.



m. Between April 28, 2017 and August 14, 2019, CAN JIANG purchased the payment card data of at least 2,423 payment cards from the Co-Schemer B Websites, including at least 1,740 cards used at Company A stores and stolen by Co-Schemer A, in exchange for at least approximately \$163,054 worth of Bitcoin.

n. Between January 25, 2017 and November 1, 2019, ESRON A. MURRELL purchased the payment card data of at least 2,125 payment cards from the Co-Schemer B Websites, including at least 1,139 cards used at Company A stores and stolen by Co-Schemer A, in exchange for at least approximately \$113,412 worth of Bitcoin.

o. Between June 22, 2017 and January 22, 2020, ZANPENG CHEN purchased the payment card data of at least 1,957 payment cards from the Co-Schemer B Websites, including at least 1,633 cards used at Company A stores and stolen by Co-Schemer A, in exchange for at least approximately \$36,998 worth of Bitcoin.

p. Between March 18, 2017 and November 19, 2019, JEFF MURAT purchased the payment card data of at least 1,711 payment cards from the Co-Schemer B Websites, including at least 1,064 cards used at Company A stores and stolen by Co-Schemer A, in exchange for at least approximately \$44,909 worth of Bitcoin.

q. Between February 16, 2017 and November 20, 2019, CHRISTOPHER T. THOMPSON purchased the payment card data of at least 1,651

payment cards from the Co-Schemer B Websites, including at least 889 cards used at Company A stores and stolen by Co-Schemer A, in exchange for at least approximately \$67,986 worth of Bitcoin.

r. Between February 2, 2017 and January 27, 2020, , JOHN LIU, a/k/a "Xiqiang Liu," purchased the payment card data of at least 1,476 payment cards from the Co-Schemer B Websites, including at least 1,173 cards used at Company A stores and stolen by Co-Schemer A, in exchange for at least approximately \$28,760 worth of Bitcoin.

s. Between July 13, 2017 and November 13, 2019, SADIKIFU NAWAB SHABAZZ purchased the payment card data of at least 1,371 payment cards from the Co-Schemer B Websites, including at least 670 cards used at Company A stores and stolen by Co-Schemer A, in exchange for at least approximately \$17,844 worth of Bitcoin.

t. Between April 20, 2017 and November 5, 2019, BYRON HICKMAN purchased the payment card data of at least 1,170 payment cards from the Co-Schemer B Websites, including at least 832 cards used at Company A stores and stolen by Co-Schemer A, in exchange for at least approximately \$29,014 worth of Bitcoin.

u. Between January 26, 2017 and August 22, 2019, CLIVE BAKER purchased the payment card data of at least 806 payment cards from the Co-Schemer B Websites, including at least 558 cards used at Company A stores and stolen by Co-Schemer A, in exchange for at least approximately \$34,627 worth of Bitcoin.

v. Between June 3, 2017 and November 15, 2019, DAVIN SMART purchased the payment card data of at least 752 payment cards from the Co-Schemer B Websites, including at least 385 cards used at Company A stores and stolen by Co-Schemer A, in exchange for at least approximately \$9,942 worth of Bitcoin.

w. Between May 3, 2018 and October 21, 2019, Co-Schemer C, together with BARRY SHI, purchased payment card data from the Co-Schemer B Websites in exchange for at least approximately \$1,649 worth of Bitcoin.

9. It was further part of the scheme that BARRY SHI, YI LIU, ENPING QU, CAN JIANG, YANG SONG (a/k/a "Nicole Song"), Co-Schemer C, and others, without authority, acquired and exchanged between each other payment card data, including data that each had purchased from the Co-Schemer B Websites. Specifically:

a. Between no later than December 26, 2016, and continuing until at least January 28, 2020, BARRY SHI and YI LIU acquired and exchanged the payment card data of approximately 1,596 payment cards, including at least 151 cards purchased from the Co-Schemer B Websites.

b. Between no later than June 8, 2016, and continuing until at least March 30, 2018, BARRY SHI and ENPING QU acquired and exchanged the payment card data of approximately 880 payment cards, including at least 13 cards purchased from the Co-Schemer B Websites.

c. Between no later than August 29, 2017, and continuing until at least July 4, 2019, BARRY SHI and CAN JIANG acquired and exchanged the

payment card data of approximately 1,512 payment cards, including at least 371 cards purchased from the Co-Schemer B Websites.

d. Between no later than May 22, 2016, and continuing until at least September 16, 2019, BARRY SHI and YANG SONG acquired and exchanged the payment card data of approximately 1,757 payment cards, including at least 398 cards purchased from the Co-Schemer B Websites.

e. Between no later than June 13, 2017, and continuing until at least January 22, 2020, BARRY SHI and Co-Schemer C acquired and exchanged the payment card data of approximately 10,041 payment cards, including at least 768 cards purchased from the Co-Schemer B Websites, of which approximately 524 were used at Company A stores and stolen by Co-Schemer A.

10. It was further part of the scheme that, between no later than January 25, 2017, and continuing until at least January 27, 2020, BARRY SHI, ANDREW DARIEN MCLEOD, JAMEL T. WILLIAMS, SAAQUAN RAM, JAMES B. GIBBS, YI LIU, CHRISTOPHER JOHNSON, DAJUAN GEE, YANG SONG (a/k/a "Nicole Song"), JAYVON A. PUGH, KADEEM DEAN, ENPING QU, CAN JIANG, ESRON A. MURRELL, ZANPENG CHEN, JEFF MURAT, CHRISTOPHER T. THOMPSON, JOHN LIU (a/k/a "Xiqiang Liu"), SADIKIFU NAWAB SHABAZZ, BYRON HICKMAN, CLIVE BAKER, and DAVIN SMART knowingly and fraudulently used, attempted to use, and caused to be used, the payment card data that they had purchased from the Co-Schemer B Websites, including the payment card data of Victims 1 through 80, to buy goods and services without authorization of victims.

11. It was further part of the scheme that defendants BARRY SHI, ANDREW DARIEN MCLEOD, JAMEL T. WILLIAMS, SAAQUAN RAM, JAMES B. GIBBS, YI LIU, CHRISTOPHER JOHNSON, DAJUAN GEE, YANG SONG (a/k/a “Nicole Song”), JAYVON A. PUGH, KADEEM DEAN, ENPING QU, CAN JIANG, ESRON A. MURRELL, ZANPENG CHEN, JEFF MURAT, CHRISTOPHER T. THOMPSON, JOHN LIU (a/k/a “Xiqiang Liu”), SADIKIFU NAWAB SHABAZZ, BYRON HICKMAN, CLIVE BAKER, DAVIN SMART, Co-Schemer A, Co-Schemer B, Co-Schemer C, and others concealed, misrepresented, and hid and caused to be concealed, misrepresented, and hidden, the existence and purpose of the scheme and the acts done in furtherance of the scheme.

12. On or about the dates set forth below, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendants, as set forth below, for the purpose of executing the above-described scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, listed below, each such writing, sign, and signal constituting a separate count:

COUNT	DEFENDANT	DATE	WRITING, SIGN, AND SIGNAL
One	BARRY SHI	January 5, 2019	a request to authorize a purchase in the amount of approximately \$98.20 at a Company B store in Santa Clara, California, by way of a location outside of California, using payment card data ending in 3464 and belonging to Victim 1

COUNT	DEFENDANT	DATE	WRITING, SIGN, AND SIGNAL
Two	ANDREW DARIEN MCLEOD	March 10, 2017	a request to authorize a purchase in the amount of approximately \$89.03 at a Company C store in Warner Robins, Georgia, by way of a location outside of Georgia, using payment card data ending in 7296 and belonging to Victim 10
Three	JAMEL T. WILLIAMS	March 12, 2018	a request to authorize a purchase in the amount of approximately \$50.00 at a Company D store in Philadelphia, Pennsylvania, by way of a location outside of Pennsylvania, using payment card data ending in 0336 and belonging to Victim 14
Four	SAAQUAN RAM	September 10, 2017	a request to authorize a purchase in the amount of approximately \$31.46 at a Company E restaurant in Grand Rapids, Michigan, by way of a location outside of Michigan, using payment card data ending in 7269 and belonging to Victim 18
Five	JAMES B. GIBBS	May 28, 2017	a request to authorize a purchase in the amount of approximately \$200.38 at a Company F store in Columbia, South Carolina, by way of a location outside of South Carolina, using payment card data ending in 4843 and belonging to Victim 22;
Six	YI LIU	July 1, 2018	a request to authorize a purchase in the amount of approximately \$379.65 at a Company G store in Los Angeles, California, by way of a location outside of California, using payment card data ending in 5976 and belonging to Victim 25

COUNT	DEFENDANT	DATE	WRITING, SIGN, AND SIGNAL
Seven	CHRISTOPHER JOHNSON	August 16, 2018	a request to authorize a purchase in the amount of approximately \$3.73 at a Company H store in Woodbridge, New Jersey, by way of a location outside of New Jersey, using payment card data ending in 9494 and belonging to Victim 31
Eight	DAJUAN GEE	October 9, 2017	a request to authorize a purchase in the amount of approximately \$20.00 at a Company I store in Michigan City, Indiana, by way of a location outside of Indiana, using payment card data ending in 1293 and belonging to Victim 35
Nine	YANG SONG	May 29, 2017	a request to authorize a purchase in the amount of approximately \$1,033.13 at a Company J store in Beverly Hills, California, by way of a location outside of California, using payment card data ending in 9422 and belonging to Victim 38
Ten	JAYVON A. PUGH	April 24, 2017	a request to authorize a purchase in the amount of approximately \$500 at a Company D store in North Bergen, New Jersey, by way of a location outside of New Jersey, using payment card data ending in 2601 and belonging to Victim 43
Eleven	KADEEM DEAN	March 3, 2017	a request to authorize a purchase in the amount of approximately \$526.25 at a Company L store in Dunwoody, Georgia, by way of a location outside of Georgia, using payment card data ending in 3390 and belonging to Victim 51
Twelve	ENPING QU	November 3, 2017	a request to authorize a purchase in the amount of approximately \$323.03 at a Company G store in Torrance, California, by way of a location outside of California, using payment card data ending in 0591 and belonging to Victim 52

<b>COUNT</b>	<b>DEFENDANT</b>	<b>DATE</b>	<b>WRITING, SIGN, AND SIGNAL</b>
Thirteen	CAN JIANG	November 1, 2017	transaction details for a purchase in the amount of approximately \$475.13 at Company M; using payment card data ending in 0759 and belonging to Victim 54, which details were sent from Wisconsin to Illinois
Fourteen	ESRON A. MURRELL	December 15, 2017	a request to authorize a purchase in the amount of approximately \$100.00 at a Company D store in Atlanta, Georgia, by way of a location outside of Georgia, using payment card data ending in 6527 and belonging to Victim 59
Fifteen	ZANPENG CHEN	December 25, 2018	a request to authorize a purchase in the amount of approximately \$6.38 at a Company N hotel in San Diego, California, by way of a location outside of California, using payment card data ending in 9152 and belonging to Victim 60
Sixteen	JEFF MURAT	March 22, 2017	a request to authorize a purchase in the amount of approximately \$50.00 at a Company L store in Miami, Florida, by way of a location outside of Florida, using payment card data ending in 2615 and belonging to Victim 63
Seventeen	CHRISTOPHER T. THOMPSON	July 17, 2017	a request to authorize a purchase in the amount of approximately \$35.06 at a Company O store in North Hollywood, California, by way of a location outside of California, using payment card data ending in 9271 and belonging to Victim 64
Eighteen	JOHN LIU; a/k/a "Xiqiang Liu"	June 5, 2017	a request to authorize a purchase in the amount of approximately \$266.98 at a Company P store in Alhambra, California, by way of a location outside of California, using payment card data ending in 3632 and belonging to Victim 68



<b>COUNT</b>	<b>DEFENDANT</b>	<b>DATE</b>	<b>WRITING, SIGN, AND SIGNAL</b>
Nineteen	SADIKIFU NAWAB SHABAZZ	May 14, 2018	a request to authorize a purchase in the amount of approximately \$7.14 at a Company Q Store in Hudsonville, Michigan, by way of a location outside of Michigan, using payment card data ending in 0035 and belonging to Victim 72
Twenty	BYRON HICKMAN	October 14, 2017	a request to authorize a purchase in the amount of approximately \$34.56 at a Company R restaurant in Glendale, Colorado, by way of a location outside of Colorado, using payment card data ending in 8889 and belonging to Victim 73
Twenty- One	CLIVE BAKER	June 21, 2017	a request to authorize a purchase in the amount of approximately \$2.58 at a Company S gas station in Lithonia, Georgia, by way of a location outside of Georgia, using payment card data ending in 4765 and belonging to Victim 76
Twenty- Two	DAVIN SMART	July 6, 2018	a request to authorize a purchase in the amount of approximately \$47.91 at a Company T store in Brooklyn, New York, by way of a location outside of New York, using payment card data ending in 7392 and belonging to Victim 78

In violation of Title 18, United States Code, Section 1343.

**COUNT TWENTY-THREE**

The SPECIAL MAY 2019 GRAND JURY further charges:

1. Paragraphs 1(a) through (d) of Counts One through Twenty-Two are incorporated here.

2. On or about January 5, 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

BARRY SHI,

defendant herein, during and in relation to any felony, namely wire fraud as charged in Count One, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, namely, a unique electronic identification number and access device, Victim 1's payment card data ending in 3464;

In violation of Title 18, United States Code, Section 1028A(a)(1).

**COUNT TWENTY-FOUR**

The SPECIAL MAY 2019 GRAND JURY further charges:

1. Paragraphs 1(a) through (d) of Counts One through Twenty-Two are incorporated here.

2. On or about March 10, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

**ANDREW DARIEN MCLEOD,**

defendant herein, during and in relation to any felony, namely wire fraud as charged in Count Two, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, namely, a unique electronic identification number and access device, Victim 10's payment card data ending in 7296;

In violation of Title 18, United States Code, Section 1028A(a)(1).

**COUNT TWENTY-FIVE**

The SPECIAL MAY 2019 GRAND JURY further charges:

1. Paragraphs 1(a) through (d) of Counts One through Twenty-Two are incorporated here.

2. On or about March 12, 2018, in the Northern District of Illinois, Eastern Division, and elsewhere,

**JAMEL T. WILLIAMS,**

defendant herein, during and in relation to any felony, namely wire fraud as charged in Count Three, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, namely, a unique electronic identification number and access device, Victim 14's payment card data ending in 0336;

In violation of Title 18, United States Code, Section 1028A(a)(1).

**COUNT TWENTY-SIX**

The SPECIAL MAY 2019 GRAND JURY further charges:

1. Paragraphs 1(a) through (d) of Counts One through Twenty-Two are incorporated here.

2. On or about September 10, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

SAAQUAN RAM,

defendant herein, during and in relation to any felony, namely wire fraud as charged in Count Four, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, namely, a unique electronic identification number and access device, Victim 18's payment card data ending in 7269;

In violation of Title 18, United States Code, Section 1028A(a)(1).

**COUNT TWENTY-SEVEN**

The SPECIAL MAY 2019 GRAND JURY further charges:

1. Paragraphs 1(a) through (d) of Counts One through Twenty-Two are incorporated here.

2. On or about May 28, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

JAMES B. GIBBS,

defendant herein, during and in relation to any felony, namely wire fraud as charged in Count Five, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, namely, a unique electronic identification number and access device, Victim 22's payment card data ending in 4843;

In violation of Title 18, United States Code, Section 1028A(a)(1).

**COUNT TWENTY-EIGHT**

The SPECIAL MAY 2019 GRAND JURY further charges:

1. Paragraphs 1(a) through (d) of Counts One through Twenty-Two are incorporated here.

2. On or about July 1, 2018, in the Northern District of Illinois, Eastern Division, and elsewhere,

YI LIU,

defendant herein, during and in relation to any felony, namely wire fraud as charged in Count Six, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, namely, a unique electronic identification number and access device, Victim 25's payment card data ending in 5976;

In violation of Title 18, United States Code, Section 1028A(a)(1).

**COUNT TWENTY-NINE**

The SPECIAL MAY 2019 GRAND JURY further charges:

1. Paragraphs 1(a) through (d) of Counts One through Twenty-Two are incorporated here.

2. On or about August 16, 2018, in the Northern District of Illinois, Eastern Division, and elsewhere,

**CHRISTOPHER JOHNSON,**

defendant herein, during and in relation to any felony, namely wire fraud as charged in Count Seven, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, namely, a unique electronic identification number and access device, Victim 31's payment card data ending in 9494;

In violation of Title 18, United States Code, Section 1028A(a)(1).



**COUNT THIRTY**

The SPECIAL MAY 2019 GRAND JURY further charges:

1. Paragraphs 1(a) through (d) of Counts One through Twenty-Two are incorporated here.
2. On or about October 9, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

DAJUAN GEE,

defendant herein, during and in relation to any felony, namely wire fraud as charged in Count Eight, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, namely, a unique electronic identification number and access device, Victim 35's payment card data ending in 1293;

In violation of Title 18, United States Code, Section 1028A(a)(1).

**COUNT THIRTY-ONE**

The SPECIAL MAY 2019 GRAND JURY further charges:

1. Paragraphs 1(a) through (d) of Counts One through Twenty-Two are incorporated here.

2. On or about May 29, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

YANG SONG, a/k/a “Nicole Song,”

defendant herein, during and in relation to any felony, namely wire fraud as charged in Count Nine, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, namely, a unique electronic identification number and access device, Victim 38’s payment card data ending in 9422;

In violation of Title 18, United States Code, Section 1028A(a)(1).

**COUNT THIRTY-TWO**

The SPECIAL MAY 2019 GRAND JURY further charges:

1. Paragraphs 1(a) through (d) of Counts One through Twenty-Two are incorporated here.
2. On or about April 24, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

JAYVON A. PUGH,

defendant herein, during and in relation to any felony, namely wire fraud as charged in Count Ten, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, namely, a unique electronic identification number and access device, Victim 43's payment card data ending in 2601;

In violation of Title 18, United States Code, Section 1028A(a)(1).

**COUNT THIRTY-THREE**

The SPECIAL MAY 2019 GRAND JURY further charges:

1. Paragraphs 1(a) through (d) of Counts One through Twenty-Two are incorporated here.
2. On or about March 3, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

KADEEM DEAN,

defendant herein, during and in relation to any felony, namely wire fraud as charged in Count Twelve, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, namely, a unique electronic identification number and access device, Victim 51's payment card data ending in 3390;

In violation of Title 18, United States Code, Section 1028A(a)(1).

**COUNT THIRTY-FOUR**

The SPECIAL MAY 2019 GRAND JURY further charges:

1. Paragraphs 1(a) through (d) of Counts One through Twenty-Two are incorporated here.
2. On or about November 3, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

ENPING QU,

defendant herein, during and in relation to any felony, namely wire fraud as charged in Count Thirteen, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, namely, a unique electronic identification number and access device, Victim 52's payment card data ending in 0591;

In violation of Title 18, United States Code, Section 1028A(a)(1).

**COUNT THIRTY-FIVE**

The SPECIAL MAY 2019 GRAND JURY further charges:

1. Paragraphs 1(a) through (d) of Counts One through Twenty-Two are incorporated here.

2. On or about November 1, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

CAN JIANG,

defendant herein, during and in relation to any felony, namely wire fraud as charged in Count Fourteen, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, namely, a unique electronic identification number and access device, Victim 54's payment card data ending in 0759;

In violation of Title 18, United States Code, Section 1028A(a)(1).

**COUNT THIRTY-SIX**

The SPECIAL MAY 2019 GRAND JURY further charges:

1. Paragraphs 1(a) through (d) of Counts One through Twenty-Two are incorporated here.
2. On or about December 15, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

**ESRON A. MURRELL,**

defendant herein, during and in relation to any felony, namely wire fraud as charged in Count Fifteen, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, namely, a unique electronic identification number and access device, Victim 59's payment card data ending in 6527;

In violation of Title 18, United States Code, Section 1028A(a)(1).

**COUNT THIRTY-SEVEN**

The SPECIAL MAY 2019 GRAND JURY further charges:

1. Paragraphs 1(a) through (d) of Counts One through Twenty-Two are incorporated here.

2. On or about December 25, 2018, in the Northern District of Illinois, Eastern Division, and elsewhere,

ZANPENG CHEN,

defendant herein, during and in relation to any felony, namely wire fraud as charged in Count Sixteen, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, namely, a unique electronic identification number and access device, Victim 60's payment card data ending in 9152;

In violation of Title 18, United States Code, Section 1028A(a)(1).



**COUNT THIRTY-EIGHT**

The SPECIAL MAY 2019 GRAND JURY further charges:

1. Paragraphs 1(a) through (d) of Counts One through Twenty-Two are incorporated here.
2. On or about March 22, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

**JEFF MURAT,**

defendant herein, during and in relation to any felony, namely wire fraud as charged in Count Seventeen, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, namely, a unique electronic identification number and access device, Victim 63's payment card data ending in 2615;

In violation of Title 18, United States Code, Section 1028A(a)(1).

**COUNT THIRTY-NINE**

The SPECIAL MAY 2019 GRAND JURY further charges:

1. Paragraphs 1(a) through (d) of Counts One through Twenty-Two are incorporated here.
2. On or about July 17, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

CHRISTOPHER T. THOMPSON,

defendant herein, during and in relation to any felony, namely wire fraud as charged in Count Eighteen, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, namely, a unique electronic identification number and access device, Victim 64's payment card data ending in 9271;

In violation of Title 18, United States Code, Section 1028A(a)(1).

**COUNT FORTY**

The SPECIAL MAY 2019 GRAND JURY further charges:

1. Paragraphs 1(a) through (d) of Counts One through Twenty-Two are incorporated here.
2. On or about June 5, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOHN LIU, a/k/a "Xiqiang Liu,"

defendant herein, during and in relation to any felony, namely wire fraud as charged in Count Nineteen, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, namely, a unique electronic identification number and access device, Victim 68's payment card data ending in 3632;

In violation of Title 18, United States Code, Section 1028A(a)(1).

**COUNT FORTY-ONE**

The SPECIAL MAY 2019 GRAND JURY further charges:

1. Paragraphs 1(a) through (d) of Counts One through Twenty-Two are incorporated here.
2. On or about May 14, 2018, in the Northern District of Illinois, Eastern Division, and elsewhere,

**SADIKIFU NAWAB SHABAZZ,**

defendant herein, during and in relation to any felony, namely wire fraud as charged in Count Twenty, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, namely, a unique electronic identification number and access device, Victim 72's payment card data ending in 0035;

In violation of Title 18, United States Code, Section 1028A(a)(1).

**COUNT FORTY-TWO**

The SPECIAL MAY 2019 GRAND JURY further charges:

1. Paragraphs 1(a) through (d) of Counts One through Twenty-Two are incorporated here.

2. On or about October 14, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

BYRON HICKMAN,

defendant herein, during and in relation to any felony, namely wire fraud as charged in Count Twenty-One, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, namely, a unique electronic identification number and access device, Victim 73's payment card data ending in 8889;

In violation of Title 18, United States Code, Section 1028A(a)(1).

**COUNT FORTY-THREE**

The SPECIAL MAY 2019 GRAND JURY further charges:

1. Paragraphs 1(a) through (d) of Counts One through Twenty-Two are incorporated here.
2. On or about June 21, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

**CLIVE BAKER,**

defendant herein, during and in relation to any felony, namely wire fraud as charged in Count Twenty-Two, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, namely, a unique electronic identification number and access device, Victim 76's payment card data ending in 4765;

In violation of Title 18, United States Code, Section 1028A(a)(1).

**COUNT FORTY-FOUR**

The SPECIAL MAY 2019 GRAND JURY further charges:

1. Paragraph 1 of Count One is incorporated here.
2. On or about July 6, 2018, in the Northern District of Illinois, Eastern Division, and elsewhere,

DAVIN SMART,

defendant herein, during and in relation to any felony, namely wire fraud as charged in Count Twenty-Three, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, namely, a unique electronic identification number and access device, Victim 78's payment card data ending in 7392;

In violation of Title 18, United States Code, Section 1028A(a)(1).

**FORFEITURE ALLEGATION**

The SPECIAL MAY 2019 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Sections 1343, as set forth in this indictment, defendants shall forfeit to the United States of America any property which constitutes and is derived from proceeds traceable to the offense, as provided in Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

2. The property to be forfeited includes, but is not limited to:

- a. the following specific property seized by law enforcement on or about January 29, 2020, from 3302 Delta Avenue in Rosemead, California:
  - i. approximately 29 re-encoded payment cards;
  - ii. Company U gift card ending in 1346 with a balance of approximately \$1,000.00;
  - iii. Company U gift card ending in 1155 with a balance of approximately \$500.00;
  - iv. Company V gift card ending in 0345 with a balance of approximately \$500.00;
  - v. Company G gift card ending in 0942 with a balance of approximately \$200.00;
  - vi. Company G gift card ending in 7963 with a balance of approximately \$200.00;
  - vii. approximately \$32,400 in U.S. currency;
  - viii. a Cartier watch;
  - ix. an HP laptop bearing serial number 5CD712C69V;
  - x. an HP laptop bearing serial number CND65163QF;
  - xi. a Razer laptop with the serial number BY1902A62301715;



- xii. an iPhone bearing serial number DNPW6VJ5JCLF; and
  - xiii. an iPhone bearing serial number F2LZH778N70L;
- b. the following specific property seized by law enforcement on or about November 5, 2019, from 457 Onderdonk Avenue, Apartment 2R, in Ridgewood, New York:
- i. approximately 40 re-encoded payment cards and one payment card with a cardholder name that is not an occupant of the residence; and
  - ii. an iPhone 11 bearing IMEI number 353900102910282;
- c. the following specific property seized by law enforcement on or about November 7, 2019, from 53 Woods Place, Apartment 2, Brooklyn, New York:
- i. approximately 69 re-encoded payment cards;
  - ii. approximately \$2,500 in U.S. currency; and
  - iii. an iPhone bearing serial number F17SPWKRHG6W;
- d. the following specific property seized by law enforcement on or about November 20, 2019, from 956 Underhill Avenue SW in Grand Rapids, Michigan:
- i. approximately 14 re-encoded payment cards;
  - ii. approximately \$13,800 in U.S. currency;
  - iii. a Samsung Galaxy phone bearing serial number R58KC34Z86H;
  - iv. an iPhone X bearing serial number F17VRR7UJCLG; and
  - v. an iPhone bearing serial number GHLXT1MDJCLG;
- e. the following specific property seized by law enforcement on or about November 20, 2019, from 1800 Longcreek Drive, Apartment 3K, in Columbia, South Carolina:
- i. approximately five re-encoded payment cards;

- f. the following specific property seized by law enforcement on or about January 29, 2020, from 4927 Cloverly Avenue in Temple City, California:
- i. approximately 16 re-encoded payment cards and seven payment cards with a cardholder name that is not an occupant of the residence;
  - ii. a Company W gift card ending in 2413 with a balance of approximately \$220.62;
  - iii. a Company G gift card ending in 0491 with a balance of approximately \$63.83;
  - iv. a Company G gift card ending in 3119 with a balance of approximately \$21.86;
  - v. a Company G gift card ending in 7994 with a balance of approximately \$500.00;
  - vi. a Company G gift card ending in 4693 with a balance of approximately \$500.00;
  - vii. a Company G gift card ending in 7055 with a balance of approximately \$30.21;
  - viii. a Company G gift card ending in 4796 with a balance of approximately \$226.11;
  - ix. a Company G gift card ending in 4993 with a balance of approximately \$100.00;
  - x. a Company G gift card ending in 4231 with a balance of approximately \$100.00;
  - xi. a Company G gift card ending in 9686 with a balance of approximately \$500.00;
  - xii. a Company G gift card ending in 6938 with a balance of approximately \$100.00;
  - xiii. a Company G gift card ending in 2471 with a balance of approximately \$100.00;
  - xiv. a Company G gift card ending in 9810 with a balance of approximately \$500.00;

- xv. a Company W gift card ending in 1316 with a balance of approximately \$317.37;
- xvi. a Company X gift card ending in 6780 with a balance of approximately \$500.00;
- xvii. approximately \$20,770 in U.S. currency;
- xviii. an Apple Macbook Pro bearing serial number C02ZJ2ROMD6Q;
- xix. an Apple Macbook Pro bearing serial number C02ZW5FNMD6N;
- xx. sn Apple iPhone 11 Pro Max bearing serial number G6TL1KHSN70L;
- xxi. an Apple iPhone 11 Pro Max bearing serial number F2LZJAPHN70L;
- xxii. an Apple iPhone 11 Pro Max bearing serial number F2L2JB96N70L;
- xxiii. approximately 16 Coach purses with retail packaging, attached price tags in varying amounts, or both;
- xxiv. approximately ten Michael Kors purses with retail packaging, attached price tags in varying amounts, or both;
- xxv. two Bally brand purses with retail packaging;
- xxvi. a Company LL brand leather jacket with attached price tag;
- xxvii. a Dell Inspiron laptop bearing serial number J16D6F2;
- xxviii. an Alienware laptop bearing serial number 2CNWRC2;
- xxix. an OMEN laptop computer bearing serial number 5CD8092SD6;
- xxx. an ASUS laptop bearing serial number HANOCX22B04142H;
- xxxi. a Dell XPS laptop bearing serial number 2SGFTQ2;

- xxxii. an HP laptop bearing serial number BY1849A55802291;  
and
- xxxiii. an iPhone bearing serial number F4GV90N6JC6P;
- g. the following specific property seized by law enforcement on or about November 20, 2019, from 2405 Farmall Lane in Monroe Township, New Jersey:
  - i. approximately 84 re-encoded payment cards; and
  - ii. an iPhone bearing serial number F4GRV3RRGRY5;
- h. the following specific property seized by law enforcement on or about November 20, 2019, from 28414 Franklin River Drive, #205, in Southfield, Michigan, :
  - i. approximately 44 re-encoded payment cards;
  - ii. a Seagate Barracuda 160GB hard drive bearing serial number 9VY8TCY2; and
  - iii. an Apple laptop computer bearing serial number C02R992UGFWM;
- i. the following specific property seized by law enforcement on or about November 5, 2019, from 3503 Foster Avenue, Apartment 6F, in Brooklyn, New York:
  - i. approximately eight re-encoded payment cards;
- j. the following specific property seized by law enforcement on or about January 29, 2020, from 2002 S. Olive Avenue, #B, in Alhambra, California:
  - i. approximately \$28,247 in U.S. currency;
  - ii. a Company G gift card ending in 5846 with a balance of approximately \$301.13;
  - iii. a Company Y gift card ending in 4504 with a balance of approximately \$30.28;
  - iv. a Company Y gift card ending in 5424 with a balance of approximately \$135.45;

- v. a Company Y gift card ending in 5003 with a balance of approximately \$200.00;
  - vi. an Company Z gift card ending in 2125 with a balance of approximately \$57.29;
  - vii. a Company G gift card ending in 5229 with a balance of approximately \$50.00;
  - viii. a Company AA gift card ending in 3277 with a balance of approximately \$45.00;
  - ix. a Company B gift card ending in 0440 with a balance of approximately \$243.87;
  - x. a Company Y gift card ending in 6851 with a balance of approximately \$50.00;
  - xi. an Company Z gift card ending in 0585 with a balance of approximately \$79.95;
  - xii. an HP laptop bearing serial number 5CD63325M8;
  - xiii. an HP laptop bearing serial number CND9356DSS;
  - xiv. an iPhone bearing serial number F4GVG1LYJC6N; and
  - xv. an iPhone bearing serial number F2MXD6BCKPHG;
- k. the following specific property seized by law enforcement on or about November 5, 2019, from 13137 Mathewson Court in Jamaica, New York,:
- i. approximately 48 re-encoded payment cards and one payment card with a cardholder name that is not an occupant of the residence;
  - ii. an iPhone bearing serial number F2LWJ76SJWLL;
  - iii. an iPhone bearing serial number C39Z7B4SN6XP;
  - iv. an Apple MacBook laptop bearing serial number C02SQAJLFV3; and
  - v. an iPhone bearing serial number F2LWJ6RZJWLL;

- l. the following specific property seized by law enforcement on or about November 5, 2019, from 423 Fieldstone Parkway in Jonesboro, Georgia:
  - i. approximately 15 re-encoded payment cards;
  - ii. an HP laptop bearing serial number 5CD82061KK; and
  - iii. an iPhone bearing serial number F2LSX3RRHG00;
  
- m. the following specific property seized by law enforcement on or about January 29, 2020, from 8425 Timberland Lane in Chino, California:
  - i. approximately 25 re-encoded payment cards and one payment card with a cardholder name that is not an occupant of the residence;
  - ii. a Company BB gift card ending in 6373 with a balance of approximately \$193.21;
  - iii. a Company CC gift card ending in 1209 with a balance of approximately \$200.00;
  - iv. a Company CC gift card ending in 0063 with a balance of approximately \$200.00;
  - v. a Company CC gift card ending in 9573 with a balance of approximately \$250.00;
  - vi. a Company CC gift card ending in 6108 with a balance of approximately \$250.00;
  - vii. a Company DD gift card ending in 1317 with a balance of approximately \$300.00;
  - viii. a Company DD gift card ending in 3930 with a balance of approximately \$250.00;
  - ix. a Company EE gift card ending in 4775 with a balance of approximately \$100.00;
  - x. a Company FF gift card ending in 3556 with a balance of approximately \$646.25;
  - xi. a Company FF gift card ending in 3572 with a balance of approximately \$736.10;

- xii. a Company GG gift card ending in 3996 with a balance of approximately \$350.00;
- xiii. a Company GG gift card ending in 4848 with a balance of approximately \$100.00;
- xiv. a Company GG gift card ending in 4002 with a balance of approximately \$350.00;
- xv. a Company GG gift card ending in 0339 with a balance of approximately \$300;
- xvi. a Company GG gift card ending in 7853 with a balance of approximately \$150.00;
- xvii. a Company GG gift card ending in 0347 with a balance of approximately \$300.00;
- xviii. a Company HH gift card ending in 4218 with a balance of approximately \$150.00;
- xix. a Company HH gift card ending in 4200 with a balance of approximately \$150.00;
- xx. a Company II gift card ending in 5963 with a balance of approximately \$200.00;
- xxi. a Company FF gift card ending in 8271 with a balance of approximately \$224.02;
- xxii. a Company FF gift card ending in 4848 with a balance of approximately \$1,131.79;
- xxiii. a Company G gift card ending in 0168 with a balance of approximately \$305.00;
- xxiv. a Company G gift card ending in 3302 with a balance of approximately \$1,263.78;
- xxv. a Company G gift card ending in 3833 with a balance of approximately \$100.00;
- xxvi. a Company JJ gift card ending in 5862 with a balance of approximately \$150.00;
- xxvii. a Company AA gift card ending in 4478 with a balance of approximately \$466.00;

- xxviii. a Company AA gift card ending in 4492 with a balance of approximately \$107.24;
- xxix. a Company BB gift card ending in 6257 with a balance of approximately \$498.22;
- xxx. a Company BB gift card ending in 4043 with a balance of approximately \$498.22;
- xxxi. a Company BB gift card ending in 1138 with a balance of approximately \$499.38;
- xxxii. a Company BB gift card ending in 8218 with a balance ending in approximately \$499.38;
- xxxiii. a Company BB gift card ending in 3489 with a balance of approximately \$498.22;
- xxxiv. a Company BB gift card ending in 9528 with a balance of approximately \$627.93;
- xxxv. a Company BB gift card ending in 3185 with a balance of approximately \$498.22;
- xxxvi. A Company BB gift card ending in 8966 with a balance of approximately \$498.22;
- xxxvii. A Company BB gift card ending in 3714 with a balance of approximately \$498.22;
- xxxviii. a Company BB gift card ending in 3986 with a balance of approximately \$498.22;
- xxxix. a Company BB gift card ending in 1658 with a balance of approximately \$498.22;
- xl. a Company BB gift card ending in 2406 with a balance of approximately \$498.22;
- xli. a Company BB gift card ending in 9417 with a balance of approximately \$498.22;
- xlii. a Company BB gift card ending in 7509 with a balance of approximately \$668.82;
- xliii. a Company KK gift card ending in 9896 with a balance of \$150.00;



- xliv. a Company KK gift card ending in 0785 with a balance of approximately \$150.00;
- xlv. a Company KK gift card ending in 5802 with a balance of approximately \$150.00;
- xlvi. a Company LL gift card ending in FWH4 with a balance of approximately \$180.00;
- xlvii. a Company LL gift card ending in 05LD with a balance of approximately \$180.00;
- xlviii. approximately 31 pieces of clothing and accessories purchased in varying amounts from Company B using gift cards;
- xlix. two pairs of Prada sunglasses from Company B for approximately \$730.55 with gift cards;
- l. three pairs of Ray-Ban sunglasses and a Coach purse purchased from Company B for approximately \$582.54 with a gift card;
- li. approximately six Coach purses purchased in varying amounts from Company B using gift cards;
- lii. approximately eight bottles of Lancome perfume and two bottles of Chanel perfume purchased in varying amounts from Company B using gift cards;
- liii. approximately ten boxes of Estee Lauder cosmetics purchased in varying amounts from Company B using gift cards;
- liv. approximately 26 pieces of clothing, shoes, and accessories
- lv. a Gucci purse purchased for approximately \$2,628 from Company G using gift cards;
- lvi. three Michael Kors purses purchased for approximately \$924.18 with a gift card;
- lvii. a bottle of 2013 Opus One wine purchased for \$1,092.47 with a Company DD gift cards;
- lviii. a Canon EFS 55-250mm camera lens in commercial packaging;

- lix. a Canon EFS 75-300mm camera lens in commercial packaging;
  - lx. approximately 12 boxes of SK-II beauty products;
  - lxi. approximately ten Estee Lauder beauty products contained in a Company B box purchased for approximately \$1,213.50 with gift cards;
  - lxii. approximately four boxes of Lancome beauty products purchased from Company B for \$779.64 with gift cards;
  - lxiii. approximately three boxes of Lancome beauty products purchased from ULTRA Beauty with gift cards;
  - lxiv. approximately 19 boxes of SK-II beauty products purchased from Company BB with gift cards;
  - lxv. Beats Studio wireless headphones bearing serial number GD6YRX13KCD5;
  - lxvi. Powerbeats Pro headphones bearing serial number GWMYVM4BLN3J;
  - lxvii. an Apple Watch series 4 bearing serial number FHLZ49CKKDH0;
  - lxviii. an Apple Watch series 4 bearing serial number D92Y4S441KDT8;
  - lxix. an Apple iPad Air bearing serial number DMPZ68SCLMPD;
  - lxx. an Apple iPad bearing serial number DMPYL41DJF8J;
  - lxxi. an Apple iPad Pro bearing serial number DMPZ77SHKD6L;
  - lxxii. an Apple iPhone bearing serial number FCCSW84YHFXW; and
  - lxxiii. an Apple iPhone bearing serial number FFWXFG82KPHH;
- n. the following specific property seized by law enforcement on or about November 20, 2019, from 3200 Mary Street, Apartment 10, in Miami, Florida:

- i. approximately 37 re-encoded payment cards;
  - ii. approximately \$9,008 in U.S. currency; and
  - iii. an iPhone bearing serial number FVMS40QGGRY0;
- o. the following specific property seized by law enforcement on or about November 20, 2019, from 23228 West Vail Drive in West Hills, California:
- i. approximately \$26,980 in U.S. currency;
  - ii. approximately 22 re-encoded payment cards and one payment card with a cardholder name that is not an occupant of the residence;
  - iii. an Apple iPhone XR bearing serial number DNPYJCQLKXKN;
  - iv. an Apple MacBook Pro bearing serial number C025LA4YG8WN;
  - v. an Acer laptop bearing serial number NXMRAWAA0235120D1076600;
  - vi. an Acer laptop bearing serial number NXMVHAA02653313;
  - vii. a Dell laptop with the model number PP18C;
  - viii. an HP laptop bearing serial number CND5381DJJ; and
  - ix. a 16 GB Lexar USB thumb drive;
- p. the following specific property seized by law enforcement on or about January 29, 2020, from 361 E. Michelle Street in West Covina, California:
- i. approximately 39 re-encoded payment cards and six payment cards with a cardholder name that is not an occupant of the residence;
  - ii. approximately \$6,290 in U.S. currency;
  - iii. an MSI brand computer bearing serial number MSB906H2S0103713; and

- iv. a Seagate Barracuda hard drive bearing serial number S1D5YP9K;
- q. the following specific property seized by law enforcement on or about November 20, 2019, from 2939 Edgewater Street SW in Atlanta, Georgia:
  - i. approximately \$3,790 in U.S. currency;
  - ii. an iPad;
  - iii. an LG G2 phone;
  - iv. an LG Optimus phone;
  - v. an HP laptop computer bearing serial number 5CG2453562; and
  - vi. a Macbook Air bearing serial number C02P7FZ2GFWM;
- r. the following specific property seized by law enforcement on or about November 7, 2019, from 505 E. 120th Street, Unit 10H, in New York, New York:
  - i. approximately five re-encoded payment cards and one payment card with a cardholder name that is not an occupant of the residence;
  - ii. an Apple Macbook bearing serial number C02SC0C9FVH3; and
  - iii. an Apple iPhone bearing serial number FDPSM4KMG5MQ;
- s. the following specific property seized by law enforcement on or about November 26, 2019, from 418 General Drive in Spotsylvania, Virginia:
  - i. an Alcatel brand Android phone; and
  - ii. a Samsung Galaxy phone bearing serial number R58KA31054P.

3. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been

transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, as provided by Title 21, United States Code Section 853(p).

A TRUE BILL:

---

FOREPERSON

---

Signed by Steven J. Dollear  
on behalf of the  
UNITED STATES ATTORNEY